

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

IN RE:  BDC GROUP, INC.,  Debtor.	Bankruptcy Case No. 23-00484 Appeal No. 24-cv-00114-LTS-MAR  <b>COUNTER DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL</b>
---	--

Appellee Keystone Savings Bank, pursuant to Fed. R. App. P. 8009(a), hereby counter-designates the following items to be included in the record on appeal:

Docket Entries

1. Relevant Docket Entries, United States Bankruptcy Court for the Northern District of Iowa, Case No. 23-00484
2. Motion for Order to Show Cause, ECF No. 431 (Feb. 23, 2024) and all related attachments, Exhibit 1 (ECF No. 431-1), Exhibit 2 (ECF No. 431-2), and Exhibit 3 (ECF No. 431-3).
3. Notice of Motion for Order to Show Cause and Notice Setting Bar Date for Objections, ECF No. 432 (Feb. 23, 2024).
4. Reply Supporting Motion for Order to Show Cause, ECF No. 457 (March 21, 2024) and all related attachments, Exhibit 4 (ECF No. 457-1), Exhibit 5 (ECF No. 457-2), and Exhibit 6 (ECF No. 457-3).
5. Reply to Amended Objection to Motion for Order to Show Cause, ECF No. 482 (April 26, 2024) and all related attachments, Exhibit 7 (ECF No. 482-1), Exhibit 8 (ECF No. 482-2), Exhibit 9 (ECF No. 482-3).

Dated: October 31, 2024

Respectfully Submitted,

SIMMONS PERRINE MOYER BERGMAN PLC

/s/ Abram V. Carls

Eric W. Lam, AT0004416  
Abram V. Carls, AT0011818  
115 Third Street SE, Suite 1200  
Cedar Rapids, IA 52401  
Phone: 319-366-7641  
Facsimile: 319-366-1917

elam@simmonsperrine.com  
acarls@spmbllaw.com  
ATTORNEYS FOR KEYSTONE SAVINGS BANK

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 31, 2024, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF System.

/s/ Abram V. Carls